

**KAROLY LAW OFFICES, P.C.**  
1555 N 18TH STREET  
ALLENTOWN, PENNSYLVANIA 18104  
TELEPHONE 610-820-9790  
FACSIMILE 610-820-9909

JOHN P KAROLY, JR  
LEWIS L. THOMPSON, JR  
MICHAEL P GOUGH

IN REPLY, PLEASE REFER  
TO FILE NO

August 25, 2004

Alva E Smith  
General Counsel's Office  
Federal Election Commission  
Washington, D C 20463

**Sent via facsimile 202-219-3923 and First Class Mail**

**RE: MUR 5504**

Dear Ms Smith

It was a pleasure speaking to you

Pursuant to our discussion, I am hereby requesting a ten (10) day extension in which to respond to the within Complaint on behalf of myself and all Respondents in the matter captioned above (ie, Rebecca Karoly, Joshua Karoly, Gregory Paglianite, Mary Ellen Paglianite, Heather Kovacs, Christian Ligotti, Matthew Ligotti, Jayann Brantley, Theodore Brantley and Eric Darius)

The requested extension is required as a result of the absences due to the vacations of various of the above individuals and my present court commitments (coming on the heels of a six-month federal jury trial)

In the interim, I am enclosing herewith a preliminary filing which includes sworn affidavit denials of each of the Respondents and corresponding Statements of Designation of Counsel

While I would hope that the enclosed sworn denials would be sufficient to demonstrate that no action should be taken against any Respondent based upon Jonathan Weiss's scurrilous, baseless and vindictive complaint, I believe that a more complete response will prove helpful, if only to make evident Jonathan Weiss's intentional and unconscionable abuse of the Act

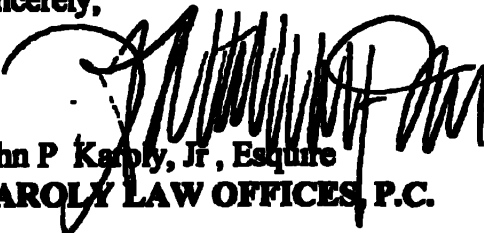
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If there is anything further you require at this time, please advise

Thanking you in advance for your kind consideration to this request, I remain,

Sincerely,



John P. Karoly, Jr., Esquire  
KAROLY LAW OFFICES, P.C.

enclosures

cc All Respondents

29044243354

**STATEMENT OF DESIGNATION OF COUNSEL**

Please use one form for each respondent

MUR 5504

**NAME OF COUNSEL** John P Karoly, Jr , Esquire  
**FIRM** KAROLY LAW OFFICES, P C  
**ADDRESS** 1555 North 18<sup>th</sup> Street  
Allentown, Pennsylvania 18104  
**TELEPHONE** 610-820-9790  
**FACSIMILE** 610-820-9909

The above-named individual is hereby designated as my counsel and is Authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission

Jayann Brantley  
JAYANN BRANTLEY

Date 8/18/04

Jayann Brantley  
Signature

Title

**RESPONDENT'S NAME** JAYANN BRANTLEY  
**ADDRESS** [REDACTED]  
Lehighton, PA 18078  
**TELEPHONE HOME** [REDACTED]  
**BUSINESS** (610) 820-9790

# STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each respondent.

MUR 5504

NAME OF COUNSEL: John P. Karoly, Jr., Esquire

FIRM: KAROLY LAW OFFICES, P.C.

ADDRESS: 1555 North 18th Street

Allentown, PA 18104

TELEPHONE: ( 610 ) 820-9790

FAX: ( 610 ) 820-9909

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Eric Delius

Print Name

8/22/07

Date

[Signature]

Signature

Title

RESPONDENT'S NAME: John P. Karoly, Jr., Esquire

ADDRESS: 1555 North 18th Street

Allentown PA 18104

TELEPHONE: HOME( )

BUSINESS( )

29044243356

**STATEMENT OF DESIGNATION OF COUNSEL**

Please use one form for each respondent

MUR 5504

**NAME OF COUNSEL** John P Karoly, Jr , Esquire

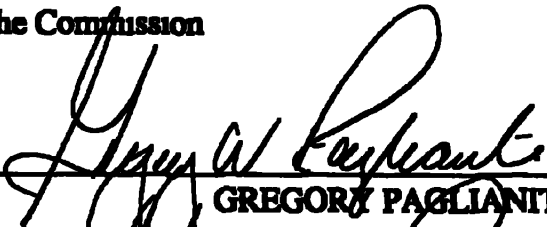
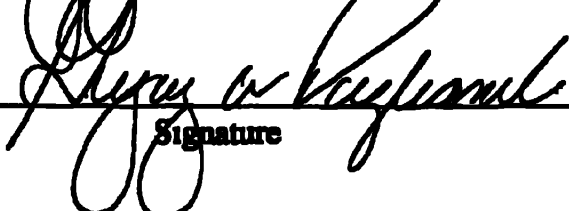
**FIRM** KAROLY LAW OFFICES, P C

**ADDRESS** 1555 North 18<sup>th</sup> Street  
Allentown, Pennsylvania 18104

**TELEPHONE** 610-820-9790

**FACSIMILE** 610-820-9909

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\_\_\_\_\_  
GREGORY PAGLIANTE  
Date 8/18/04   
\_\_\_\_\_  
Signature \_\_\_\_\_ Title \_\_\_\_\_

**RESPONDENT'S NAME** GREGORY PAGLIANTE

**ADDRESS**   
Schnecksville, PA 18078

**TELEPHONE HOME** 

**BUSINESS** (610) 820-9790

29044243357

**STATEMENT OF DESIGNATION OF COUNSEL**

Please use one form for each respondent

MUR 5504

**NAME OF COUNSEL** John P Karoly, Jr , Esquire  
**FIRM** KAROLY LAW OFFICES, P C  
**ADDRESS** 1555 North 18<sup>th</sup> Street  
Allentown, Pennsylvania 18104  
**TELEPHONE** 610-820-9790  
**FACSIMILE** 610-820-9909

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Joshua Karoly  
JOSHUA KAROLY  
Date 8-18-04 [Signature] \_\_\_\_\_  
Signature Title

**RESPONDENT'S NAME** JOSHUA KAROLY  
**ADDRESS** [REDACTED]  
Allentown, PA 18104  
**TELEPHONE HOME** [REDACTED]  
**BUSINESS** (610)

**Please use one form for each respondent**

**NAME OF COUNSEL**      **John P Karoly, Jr , Esquire**

**FIRM** **KAROLY LAW OFFICES, P C**

**ADDRESS**                    **1555 North 18<sup>th</sup> Street**  
**Allentown, Pennsylvania 18104**

**TELEPHONE 610-820-9790**

**FACSIMILE** **610-820-9909**

**The above-named individual is hereby designated as my counsel and is Authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission**

Rebecca Karoly  
REBECCA KAROLY

Date 8-18-04 *Rebecca K. Kelly* \_\_\_\_\_  
Signature Title

**RESPONDENT'S NAME** **REBECCA KAROLY**

**ADDRESS.** [REDACTED]  
Allentown, PA 18104

**TELEPHONE HOME** [REDACTED]

**BUSINESS (610)**

**STATEMENT OF DESIGNATION OF COUNSEL**

Please use one form for each respondent

MUR \_\_\_\_\_5504\_\_\_\_\_

**NAME OF COUNSEL** John P Karoly, Jr , Esquire

**FIRM** KAROLY LAW OFFICES, P C

**ADDRESS** 1555 North 18<sup>th</sup> Street  
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**TELEPHONE** 610-820-9790

**FACSIMILE** 610-820-9909


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\_\_\_\_\_  
CHRISTINA LIGOTTI

Date 8-18-04   
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

**RESPONDENT'S NAME** CHRISTINA LIGOTTI

**ADDRESS**   
Northampton, PA 18067

**TELEPHONE HOME** 

**BUSINESS** (610) 820-9790

29044243360



**STATEMENT OF DESIGNATION OF COUNSEL**

Please use one form for each respondent

MUR 5504

**NAME OF COUNSEL** John P Karoly, Jr , Esquire

**FIRM** KAROLY LAW OFFICES, P C

**ADDRESS** 1555 North 18<sup>th</sup> Street  
Allentown, Pennsylvania 18104

**TELEPHONE** 610-820-9790

**FACSIMILE** 610-820-9909

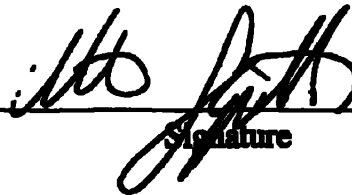
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MATTHEW LIGOTTI

MATTHEW LIGOTTI

Date

8/17/04



Signature

                      
Title

**RESPONDENT'S NAME** MATTHEW LIGOTTI

**ADDRESS**   
Northampton, PA 18067

**TELEPHONE HOME** 

**BUSINESS.** (610) 820-9790

29044243361

**STATEMENT OF DESIGNATION OF COUNSEL**


Please use one form for each respondent



MUR 5504

**NAME OF COUNSEL** John P Karoly, Jr , Esquire  
**FIRM** KAROLY LAW OFFICES, P C  
**ADDRESS** 1555 North 18<sup>th</sup> Street  
Allentown, Pennsylvania 18104  
**TELEPHONE** 610-820-9790  
**FACSIMILE** 610-820-9909

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Heather J Kovacs

Date 8/18/04   
Signature Title

**RESPONDENT'S NAME** HEATHER J KOVACS  
**ADDRESS**   
Allentown, Pennsylvania 18103  
**TELEPHONE HOME**   
**BUSINESS** (610) 820-9790

**STATEMENT OF DESIGNATION OF COUNSEL**

Please use one form for each respondent.

MUR \_\_\_\_\_5504\_\_\_\_\_

**NAME OF COUNSEL.** John P. Karoly, Jr., Esquire**FIRM** KAROLY LAW OFFICES, P.C.**ADDRESS:** 1555 North 18<sup>th</sup> Street  
Allentown, Pennsylvania 18104**TELEPHONE.** 610-820-9790**FACSIMILE.** 610-820-9909

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The above-named individual is hereby designated as my counsel and is Authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission

THEODORE F BRANTLEY JR.

THEODORE F. BRANTLEY, JR.

Date 8 18 04  
Signature\_\_\_\_\_  
Title**RESPONDENT'S NAME:** THEODORE F BRANTLEY, JR.**ADDRESS** [REDACTED]  
Lehighton, PA 18078**TELEPHONE HOME.** [REDACTED]**BUSINESS-** (610) 820-9790

29044243363